

Nov. 24. 2009 12:24PM Mast Trucking Inc.

No. 9689 P. 3

STATE OF ILLINOIS)

Atty. No 55633

) ss

COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT-LAW DIVISION

CHEYANNA JOHNSON,)

RONNIE JOHNSON and)

[REDACTED])

minor by and through her)

and guardian CHEYANNA)

JOHNSON)

Plaintiffs,)

vs.)

DONALD TRESELL and)

MAST TRUCKING)

Defendants.)

No.

Amount Claimed:

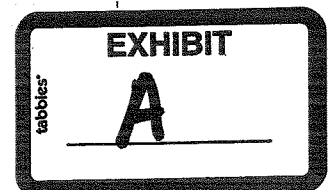
Return Date: October 31, 2009

2009LC13348
CALENDAR ROOM X
TIME 00:00
PI Motor VehicleCOMPLAINT

NOW COMES the Plaintiffs CHEYANNA JOHNSON, RONNIE JOHNSON and [REDACTED], a minor by and through her guardian CHEYANNA JOHNSON, by and through their attorneys CHADWICK & LAKERDAS, and for their complaint against Defendants DONALD TRESELL and MAST TRUCKING, states as follows:

1. On April 13, 2008, I 94 was an expressway running in a southerly and northerly direction in the City of Chicago, Cook County, Illinois.

2. On April 13, 2008, Plaintiff CHEYANNA JOHNSON was operating a vehicle and was proceeding in a southerly direction on I 94.



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3. On April 13, 2008, Defendant DONALD TRESELL, was operating a vehicle owned by MAST TRUCKING and was proceeding in a southerly direction on I 94.

4. Plaintiffs, RONNIE JOHNSON and [REDACTED] were passengers in the vehicle operated by DONALD TRESELL and owned by MAST TRUCKING, and as such, had no control of the operation of the vehicle.

5. On April 13, 2008, Defendant DONALD TRESELL operating a vehicle owned by MAST TRUCKING rear ended the vehicle being operated by Plaintiff CHEYANNA JOHNSON.

6. On or about April 13, 2008, DONALD TRESELL was the agent of MAST TRUCKING.

7. CHEYANNA JOHNSON, RONNIE JOHNSON and [REDACTED] suffered severe injuries and property damage as a result of the crash.

8. At all times relevant hereto, Defendants CHEYANNA JOHNSON and MAST TRUCKING, owed a duty to CHEYANNA JOHNSON, RONNIE JOHNSON and [REDACTED] to exercise due care by operating his vehicle in a safe and reasonable fashion.

9. That Defendant DONALD TRESELL individually, and as agent of MAST TRUCKING breached the duty of care to CHEYANNA JOHNSON, RONNIE JOHNSON and [REDACTED] and was otherwise careless and negligent in one or more of the following respects:

- a. Failing to keep said vehicle under proper control and failed to stop, slow down, or otherwise alter speed, movement or direction of said vehicle when the danger of collision with another vehicle was imminent.
- b. Failing to keep a proper lookout for other vehicles, so that as a direct result thereof, the Plaintiff was injured.
- c. Driving too fast for the present conditions.
- d. Failing to blow or give warning when a collision was imminent.

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10. As a direct and proximate result of one or more of the foregoing negligent acts or omissions, CHEYANNA JOHNSON and her passengers RONNIE JOHNSON and [REDACTED] [REDACTED] were severely injured and permanently injured; seriously and permanently disabled; experienced great conscious pain and suffering, incurred property damage, and incurred obligations for substantial sums of money for medical, hospital and related expenses, and lost income.

WHEREFORE, Plaintiffs CHEYANNA JOHNSON, RONNIE JOHNSON and [REDACTED] [REDACTED], a minor by and through her mother and guardian CHEYANNA JOHNSON, demands judgment against Defendants DONALD TRESELL, individually, and as agent of MAST TRUCKING in an amount in excess of THIRTY THOUSAND (\$30,000.00) DOLLARS plus costs of this suit, as shall represent fair and just compensation.



CHADWICK & LAKERDAS
Attorneys for Plaintiff

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Affidavit Pursuant To Illinois Supreme Court Rule 222(b)

Pursuant to the Illinois Code of Civil Procedure Section 1-109, the undersigned certifies that to the best of his knowledge the damages sought in this matter does exceed Thirty Thousand Dollars (\$30, 000.00).


James G. Lakerdas

12/24/09
DATE